

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CHRISTOPHER JOHNSON,

Plaintiff,

v.

XCALIBUR LOGISTICS,

Defendant.

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C.A. No. 4:19-CV-02996

(JURY TRIAL DEMANDED)

PLAINTIFF'S MOTION TO COMPEL
DEFENDANT'S DISCOVERY RESPONSES AND REQUEST FOR ORAL HEARING

EXHIBIT G

Katrina Patrick

From: Zinecker, Katie <Katie.Zinecker@bakermckenzie.com>
Sent: Wednesday, September 15, 2021 4:35 PM
To: Katrina Patrick
Cc: Cook, Brendan D; Brett, Lindsay Wright
Subject: Xcalibur/Johnson - 9.15.21 Supp. Production
Attachments: XCALIBUR 001293.xlsx; XCALIBUR 001294-001298.pdf; XCALIBUR 001299-001301.pdf; XCALIBUR 001302-001304.pdf; XCALIBUR 001285-001287.pdf; XCALIBUR 001288-001292.pdf

Hi Katrina,

Please see attached for a supplemental production comprised of documents Bates labeled as XCALIBUR 1285-1304. We will follow-up with supplemental discovery responses today.

Best,

Katie

Katie Zinecker
Associate, Litigation
Baker & McKenzie LLP
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Houston, TX 77002
United States
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Direct: +1 713 427 5083
Cell +1 817 913 5901
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katie.zinecker@bakermckenzie.com

**Baker
McKenzie.**

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From: Gloria Davila-Turner
Sent: Tuesday, March 13, 2018 9:25 AM
To: Jeffrey Maronen; Arturo Arreola
Cc: Mike McKey; Grae Griffin; Rody Grant; Sandi Hayes; Christy Brown; Ivonne Carbajal-Vega
Subject: Elias Ashley TERM 3/13/18 944508

FILE NUMBER 944508

Elias Ashley's Involuntary (Discharged) Termination, as of 3/13/2018, was updated in ADP and **Payroll** is being notify of Mr. Ashley's termination



Gloria Davila-Turner | Human Resource Generalist
12140 Wickchester Ln, Ste 100 | Houston, TX 77079
Tel: 713-600-2612 | Fax: 281-833-4863
gdavila-turner@nu-devco.com

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From: Jeffrey Maronen
Sent: Tuesday, March 13, 2018 7:55 AM
To: Arturo Arreola
Cc: Mike McKey; Grae Griffin; Rody Grant; Sandi Hayes; Gloria Davila-Turner
Subject: RE: Elias Ashley

Gather up all of His belongings get them out of the bunkhouse get all of our equipment back,

Terminate effective immediately hold check

Get word to this individual that he may not enter the bunk house for any reason



Jeffrey Maronen | Director
12140 Wickchester Ln, Ste 100 | Houston, TX 77079
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jmaronen@xcaliburlogistics.com | <https://www.xcaliburlogistics.com>

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From: Arturo Arreola
Sent: Tuesday, March 13, 2018 7:50 AM
To: Jeffrey Maronen
Cc: Mike McKey
Subject: Re: Elias Ashley

Police Department has confirmed he is in their custody for **Aggravated Assault and DUI.**

As soon as I get 7:00 am shift out I'll go and take pictures.

Chris Johnson's statement to the police will be ready to pick up this afternoon. I'll have him write down another statement.

Arturo Arreola Jr
M: 915-487-3854



Arturo Arreola | Assistant Operations Manager
12140 Wickchester Ln, Ste 100 | Houston, TX 77079

aarreola@xcaliburlogistics.com | <https://www.xcaliburlogistics.com>

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On Mar 13, 2018, at 06:42, Jeffrey Maronen <jmaronen@xcaliburlogistics.com> wrote:

1. Call the **police department now and find out.**
2. Go to bunkhouse and **take pictures of damage**
3. **Get statements from witnesses**

I need to have confirmation of the arrest. There is no drinking allowed in the bunkhouses.

Jeffrey Maronen



Jeffrey Maronen | Director
12140 Wickchester Ln, Ste 100 | Houston, TX 77079

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On Mar 13, 2018, at 7:16 AM, Arturo Arreola <aarreola@xcaliburlogistics.com> wrote:

I just received notice that Elias Ashley was arrested last night. I have not confirmed this with the police, this is what I have heard from other drivers. He was very drunk last night at the man camp and according to Chris Johnson, he made several derogatory comments and threatened him with a knife. Chris advised that a police report was filed and that he witnessed them picking up Elias. Elias' roommate, David McKinnon, also confirmed that he was very drunk and that he heard an altercation happening last night outside of his room. According to Chris Johnson, Elias caused property damage by kicking the skirting on the outside of the man camp trailer as well.



Arturo Arreola | Assistant Operations Manager
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